

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Mahmoud KHALIL,

Petitioner,

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

Respondents.

No. 25-cv-1963-MEF-MAH

**NOTICE OF CROSS-
MOTION FOR RE-
TRANSFER TO THE
SOUTHERN DISTRICT
OF NEW YORK**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, and previously filed briefing in this action, Petitioner Mahmoud Khalil, through counsel, hereby moves this Court to re-transfer this case to the Southern District of New York.

Respondents consent to the filing of this motion. **Petitioner waives his reply on this cross-motion, and Petitioner consents to the extension of**

Respondents' deadline to file a reply in support of their renewed motion to transfer the case to Louisiana until Thursday, March 27, at 10 a.m. ET.

Dated: March 24, 2025

Respectfully submitted,

/s/Baher Azmy

AMERICAN CIVIL LIBERTIES UNION
OF NEW JERSEY FOUNDATION
Jeanne LoCicero
Farrin R. Anello
Molly K.C. Linhorst
570 Broad Street, 11th Floor
Newark, New Jersey 07102
Tel: (973) 854-1715

NEW YORK CIVIL LIBERTIES UNION
FOUNDATION
Amy Belsher*
Robert Hodgson*
Veronica Salama*
Molly Biklen*
New York Civil Liberties Union
Foundation
125 Broad Street, 19th Floor
New York, N.Y. 10004
Tel: (212) 607-3300

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
Omar Jadwat
Noor Zafar*
Sidra Mahfooz*
Brian Hauss*

CENTER FOR CONSTITUTIONAL RIGHTS
Baher Azmy
Samah Sisay*
Diala Shamas*
666 Broadway, 7th Floor
New York, NY 10012
Tel: (212) 614-6464

CLEAR PROJECT
MAIN STREET LEGAL SERVICES, INC.
Ramzi Kassem*
Naz Ahmad
Shezza Abboushi Dallal*
Natasha Hajo, *Law Student**
Sasha Jenkins, *Law Student**
Harnoor Singh, *Law Student**
CUNY School of Law
2 Court Square
Long Island City, NY 11101
Tel: (718) 340-4558

WASHINGTON SQUARE LEGAL
SERVICES, INC.
Alina Das*
Immigrant Rights Clinic
245 Sullivan Street, 5th Floor
New York, New York 10012
Tel: (212) 998-6430

Esha Bhandari*
Vera Eidelman*
Tyler Takemoto*
Brett Max Kaufman*
American Civil Liberties Union
Foundation
125 Broad Street, Floor 18
New York, NY 10004
Tel: (212) 549-2500

DRATEL & LEWIS
Amy E. Greer
29 Broadway, Suite 1412
New York, NY 10006
Tel: (212) 732-8805
Fax: (212) 571-3792

VAN DER HOUT LLP
Marc Van Der Hout (CA Bar #80778)*
Johnny Sinodis (CA Bar #290402)*
Oona Cahill (CA Bar #354525)*
360 Post St., Suite 800
San Francisco, CA 94108
Tel: (415) 981-3000
Fax: (415) 981-3003

**Pro hac vice application pending or
forthcoming*

Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2025, I electronically filed a Notice Of Cross-Motion For Re-Transfer Of This Case To The Southern District Of New York and Proposed Order.

Notice of this filing will be sent to all counsel of record in this case via the Court's electronic filing system.

Dated: March 24, 2025

Respectfully submitted,
/s/Baher Azmy
Counsel for Petitioner